

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-21 and 25-29 are pending in this application, Claim 27 having been presently amended. Support for amended Claim 27 can be found, for example, in the original claims, drawings, and specification as originally filed. No new matter has been added.

In the outstanding Office Action, Claims 1-9, 17, 19-21, and 25-29 were rejected under 35 U.S.C. § 103(a) as unpatentable over Aweya et al. (U.S. Patent No. 7,043,651; hereinafter "Aweya") in view of Zdepski (U.S. Patent No. 5,467,137); and Claims 10-16 and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over Aweya in view of Zdepski and Lahat (U.S. Patent No. 6,963,561).

In response to the rejection of Claims 1-9, 17, 19-21, and 25-29 under 35 U.S.C. § 103(a) as unpatentable over Aweya in view of Zdepski, Applicants respectfully request reconsideration of the rejection and traverse the rejection as discussed next.

Independent Claim 1 is directed to a method of synchronizing the phase of a local image synchronization signal generator including, *inter alia*:

...frequency synchronizing said local and reference clocks;

said reference video data processor sending, via said network, to said local data processor ***an image timing packet providing reference image synchronization data*** indicating a difference in timing, measured with respect to said reference processor's clock, between a time at which said image timing packet is launched onto said network and a time of production of a reference image synchronization signal; and

said local video data processor controlling the timing of production of said local image synchronization signals in dependence ***on said reference image synchronization data and a time of arrival of said image timing packet.***

Thus, in Applicants' Claim 1, phase synchronization is achieved with transmission of only a single data packet, i.e. the timing packet, including a single timing feature relating to the internal workings of the transmitter. Independent Claims 25-27 and 29 recite substantially similar features as Claim 1. Therefore, the arguments presented below with respect to Claim 1 are also applicable to Claims 25-27 and 29.

Initially, Applicants note that Zdepski operates in a similar manner to Aweya, and believe that Applicants' claims distinguish over Zdepski for similar reasons that the claims distinguished over Aweya.

Zdepski is directed to a system and apparatus for inserting modifiable differential time codes or count values in a compressed video for developing synchronization of an intermediate layer of a signal such as a the transport or multiplex layer of a multi-layered compressed video signal.¹ However, Zdepski fails to teach or suggest "said reference video data processor sending, via said network, to said local data processor ***an image timing packet providing reference image synchronization data*** indicating a difference in timing, measured with respect to said reference processor's clock, between a time at which said image timing packet is launched onto said network and a time of production of a reference image synchronization signal,"

Column 3, lines 4-23 of Zdepski describes that a counter with a 39 second period is sampled for two purposes; the first is to include a presentation time stamp (PTR) inside video frames. The second purpose is to generate a count value, called a program clock reference (PCR) on a "predetermined schedule," and include the PCR in an auxiliary packet. However, in Zdepski, the PCR is clearly not itself a "differential count value," it is simply a count value sampled on a predetermined schedule.

¹ See Zdepski at column 1, line 65 to column 2, line 4.

Zdepski describes that at the receiver there is a corresponding local counter, and an auxiliary packet detector designed to trigger the sampling of the local counter when an auxiliary packet is received.² Zdepski also describes that the frequency of the clock in the receiver is corrected by comparing the differential between two PCRs ($PCR_n - PCR_{n-1}$), i.e. *two auxiliary packets*, and the corresponding two local counter samplings $L_n - L_{n-1}$.³ The difference between these differentials indicates the difference in clock frequency between the reference and local clocks.

Thus, the above method in Zdepski is similar to the method described in Aweya, as Zdepski also does not describe that a *single timing packet* may be used to synchronize the phase of the reference and local clocks (a detailed explanation of which was given in our response filed on March 17, 2008).

Accordingly, Applicants respectfully submit that independent Claims 1, 25-27, and 29 (and all claims depending thereon) patentably distinguish over Aweya and Zdepski, and Applicants respectfully request that the rejection of Claims 1-9, 17, and 19-29 under 35 U.S.C. § 103(a) be withdrawn.

In response to the rejection of Claims 10-16 and 18 under 35 U.S.C. § 103(a) as unpatentable over Aweya and Zdepski in view of Lahat, Applicants note that Claims 10-16 and 18 are dependent on independent Claim 1, and are thus believed to be patentable for at least the reasons discussed above. Further, Applicants respectfully submit that Lahat fails to cure any of the above-noted deficiencies of Aweya and Zdepski.

Accordingly, Applicants respectfully request that the rejection of Claims 10-16 and 18 under 35 U.S.C. § 103(a) as unpatentable over Aweya and Zdepski in view of Lahat be withdrawn.

² See Zdepski at column 4, lines 50-59.

³ See Zdepski at column 4, line 60 to column 5, line 8.

Consequently, in view of the present amendment, and in light of the above discussion, the pending claims as presented herewith are believed to be in condition for formal allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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